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Attorneys for Plaintiffs

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO**

JANE DOE NOS. 1 - 22, inclusive, individuals;

Plaintiffs,

v.

GIRLSDOPORN.COM, a business organization, form unknown; MICHAEL J. PRATT, an individual; ANDRE GARCIA, an individual; MATTHEW WOLFE, an individual; BLL MEDIA, INC., a California corporation; BLL MEDIA HOLDINGS, LLC, a Nevada limited liability company; DOMI PUBLICATIONS, LLC, a Nevada limited liability company; EG PUBLICATIONS, INC., a California corporation; MIM MEDIA, LLC, a California limited liability company; BUBBLEGUM FILMS, INC., a business organization, form unknown; OH WELL MEDIA LIMITED, a business organization, form unknown; MERRO MEDIA, INC., a California corporation; MERRO MEDIA HOLDINGS, LLC, a Nevada limited liability company; and ROES 1 - 550, inclusive,

Defendants.

LEAD CASE:

Case No.: 37-2016-00019027-CU-FR-CTL

CONSOLIDATED WITH:

Case No.: 37-2017-00033321-CU-FR-CTL

Case No.: 37-2017-00043712-CU-FR-CTL

**DECLARATION OF AMBERLYN
NORED CLARK IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANT DOMI PUBLICATION
LLC'S SPECIAL MOTION TO STRIKE
[CCP §425.16]**

Date: August 31, 2018

Time: 9:00 a.m.

Judge: Hon. Joel R. Wohlfeil

Location: C-73

DECLARATION OF AMBERLYN CLARK

I, Amberlyn Nored Clark, declare as follows:

1. I am over eighteen years of age. I have personal knowledge of each fact stated in this declaration. If called as a witness in this matter, I could and would testify as follows.

2. I have known Andre Garcia since at least September of 2015. Based on my discussions with Andre Garcia, I know he, Michael Pratt and Matthew Wolfe own and operate the pornography websites www.girlsdoporn.com and www.girlsdotoys.com.

3. Around December of 2016, Andre Garcia offered to pay me to act as a "reference" for him, Michael Pratt, and Matthew Wolfe by helping them recruit women to appear in pornographic videos for their websites. As a reference, they told me I would speak to young women, who they were attempting to recruit to appear in pornography on their websites, via phone, FaceTime, and text message in order to appease any concerns the women had.

4. Andre Garcia coached me on how to correspond with the prospective women to gain their trust, even if that included telling lies and hiding information. Garcia instructed me to do or not do the following things while speaking with the prospective women as a reference:

- to tell the prospective women that I too had previously filmed a video for them, even though I had never done so;
- to tell prospective women they would remain completely anonymous;
- to tell the women that I come from a small town, shot a video for them, that no one has found out, and that the women had nothing to worry about;
- to tell prospective women the videos they filmed would never be released in the United States or on the Internet;
- to never reveal to the prospective women the fact that Andre Garcia, Matthew Wolfe, and Michael Pratt owned and operated an online pornography company;
- to never reveal to the prospective women the fact that the previous videos Andre Garcia, Matthew Wolfe, and Michael Pratt had filmed were published on the Internet;

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- 1 - to never reveal to the prospective women the fact that the prospective women's videos were
2 going to be published on www.girlsdoporn.com, www.girlsdotoys.com, and throughout the
3 Internet, including free pornography sites like www.Pornhub.com; and
4 - to never reveal Andre Garcia, Michael Pratt, and Matthew Wolfe's real names to the
5 prospective women.

6 5. Based on discussions with Garcia, I know that Andre Garcia, Michael Pratt, and
7 Matthew Wolfe use fake names (such as Jonathan) in their advertisements for recruitment and
8 communications with the women they mean to recruit for their websites. I know they did this to avoid
9 detection.

10 6. Andre Garcia told me that they had created a rating system based on the attractiveness
11 and age of the prospective women (either Grade A, B, C, or D). The amount I was paid for each
12 reference was based on this system, ranging from \$50 up to \$200 for a "Grade A" woman.

13 7. I estimate I acted as a reference for five to seven women from around December 2016 to
14 approximately February of 2016.

15 8. I understand that a lawsuit is pending in San Diego Superior Court against Andre Garcia,
16 Michael Pratt, Matthew Wolfe, and others affiliated with www.girlsdoporn.com and
17 www.girlsdotoys.com. After the lawsuit started, Andre Garcia offered me approximately \$1,000.00 to
18 not cooperate with the women who filed the lawsuit, their attorneys, and/or otherwise testify.

19 9. Around October 2017, I received a phone call on my cell phone from an attorney while I
20 was in Cabo San Lucas with Andre Garcia. Andre Garcia took the phone from me and spoke to the
21 attorney.

22
23 I declare under penalty of perjury under the laws of the State of California that the foregoing is
24 true and correct. Executed 8/20/2018.

25
26 Amberlyn Nored
27 Amberlyn Nored Clark
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